

OCT 13 2006

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)

) ss:

COUNTY OF ALLEGHENY)

Before me, the undersigned authority, a notary public, and before the aforesaid county and state, personally appeared Thomas E. Reilly who being duly sworn accordingly to law deposes and says the following:

1. That he is over the age of 18 years and competent to take an Affidavit.
2. That he is an attorney, who has been licensed to practice by the Supreme Court of the Commonwealth of Pennsylvania and in the United States District Court for the Western District of Pennsylvania since 1977.
3. That since November 12, 1999 he has been the president of the professional corporation known as Thomas E. Reilly, P.C. and in that capacity he is familiar with the manner in which the records of Thomas E. Reilly, P.C. are maintained and can state from personal knowledge that the information contained in those records is placed in those records at or near the times that the events recorded occur.
4. That Thomas E. Reilly, P.C. uses Time Slips billing program into which the time spent by each attorney on a matter is entered in increments of one tenth of an hour and each amount is then multiplied by the program by the applicable hourly rate to calculate the monetary charge for each of the recorded events.
5. That he has printed out and attached to this Affidavit the records of Thomas E. Reilly, P.C. from the commencement of the engagement with respect to the recovery of the obligation of Plaza Entertainment, Inc. and its guarantors in the year 2000 until October 13, 2006.

6. That the hourly rate charged by Thomas E. Reilly, P.C. and specifically, Attorney Thomas E. Reilly, from the commencement of the engagement until approximately July of 2002 was the sum of \$175.00 per hour.

7. That in July of 2003, Thomas E. Reilly, P.C. and Thomas E. Reilly entered into a new arrangement with WRS, Inc., which was approved by the Bankruptcy Court and permitted Thomas E. Reilly to charge the hourly rate of \$200.00 per hour for services rendered with respect to WRS, Inc.

8. That, based upon the hourly rate and the time recorded as reflected in the attached time and billing information, the total amount accrued for attorney's fees through October 13, 2006 with respect to the enforcement of the obligation owed by Plaza Entertainment, Inc. and its guarantors to WRS, Inc. is the sum of \$86,748.00. The sum of \$89,827.54 shown in the Napor Affidavit was based upon an earlier Affidavit prepared by Thomas E. Reilly that incorrectly included court costs and expenses in the total. The total of \$86,748.00 was used in calculating the final amounts in the Motion for Summary Judgment and the Motion for Entry of Default Judgment.


Thomas E. Reilly

Sworn to and subscribed
before me this 13th day
of October, 2006.


Notary Public

